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June 1, 2024

By ECF

The Honorable Joan M. Azrack
United States District Judge
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

***Re: United States v. Arevelo-Chavez, et al.
(including Walter Yonvani Hernandez-Rivera),
22 Cr. 429 (JMA)***

Dear Judge Azrack:

I represent Defendant Walter Yovani Hernandez-Rivera in the above referenced matter and write to respectfully request that Mr. Hernandez-Rivera's appearance at the upcoming June 13, 2024, status conference be adjourned due to a scheduling conflict. On that date I am scheduled to appear before the Honorable Frederic Block in the Brooklyn Courthouse of the Eastern District of New York in United States v. Joseph Lanni, et al., 23 Cr. 443 (FB) (EDNY), wherein it is anticipated that a motion and trial schedule will be set. Given that I represent the lead defendant in that case, Mr. Lanni, my presence is required. Additionally, my co-counsel, Steve Zissou, is likewise unavailable as he has a sentencing hearing scheduled that day in the Southern District of New York in United States v. Mukhiddin Kadirov, 23 Cr. 506 (GHW) (SDNY).

I have spoken with Assistant United States Attorney John Durham who has informed me that the Government has no objection to the instant application. I have also spoken to Mr. Hernandez-Rivera, who consents to the adjournment and likewise waives time under the Speedy Trial clock to the date of his next appearance.

Yours sincerely,

/S/

Michael K. Bachrach
*Learned Counsel for
Walter Yonvani Hernandez-Rivera*

cc: All parties of record (by ECF)